

Appendix Exhibit 29

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

ERIE DIVISION

ABBY B. CONLEY,) Docket No. 05-76E
) (SEAN J. MCLAUGHLIN)
Plaintiff,)
) ELECTRONICALLY FILED PLEADING
vs.)
) JURY TRIAL DEMANDED
COUNTY OF ERIE, ERIE COUNTY)
OFFICE OF CHILDREN AND YOUTH,) AFFIDAVIT OF
a/k/a ERIE COUNTY CHILD WELFARE) MARY JO CLINE SZEWCZYK
SERVICE, RICHARD SCHENKER,)
individually and in his capacity as County) Counsel of record for this party:
Executive of Erie County, Pennsylvania,)
PETER CALLAN, individually and in his) Richard A. Lanzillo, Esq.
capacity as Erie County Director of) Knox McLaughlin Gornall
Personnel, DEBRA LIEBEL, individually) & Sennett, P.C.
and in her capacity as Executive Director,) 120 West 10 th Street
Erie County Office of Children and Youth,) Erie, PA 16501
a/k/a Erie County Child Welfare Service) Telephone (814) 459-2800
and JOHN A. ONORATO, ESQUIRE,) Facsimile (814) 453-4530
individually and in his capacity as Erie) Email rlanzillo@kmgslaw.com
County Solicitor,) PA53811
)
Defendants)

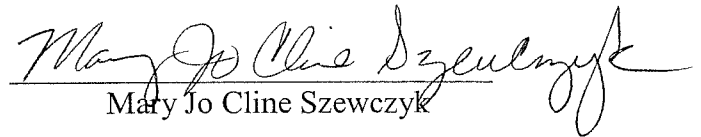
AFFIDAVIT OF MARY JO CLINE SZEWCZYK

Mary Jo Cline Szewczyk, deposes and states as follows:

1. I am currently employed as a casework supervisor for the Erie County Office of Children and Youth ("OCY"). I have been employed by OCY since 1984. I have held the position of supervisor since 1995.
2. Under no circumstances may a case worker or a social service aide (or "case aide", as they are sometimes described) disclose the existence of a prognostic detention order to the mother of the unborn child without the express consent of his or her supervisor.

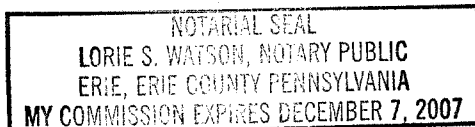
3. The existence of a prognostic detention order is disclosed to the mother only where the supervisor, in consultation with the case worker, and, if appropriate, the social service aide, determines that disclosure will not result in a risk that the mother may abscond or harm the unborn child.

4. The decision to disclose a prognostic detention order is made only after careful consideration and collaboration among the supervisor, the case worker and, possibly, the social service aide working as a team.


Mary Jo Cline Szewczyk

COMMONWEALTH OF PENNSYLVANIA)
) SS:
COUNTY OF ERIE)

On the 10th day of April, 2006, before me, personally appeared Mary Jo Cline Szewczyk, to me known to be the person named herein, who executed the foregoing Affidavit and acknowledged to me that she has read the foregoing Affidavit, understands the contents thereof and that she voluntarily executed the same.




Notary Public